

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
THIRD JUDICIAL DISTRICT, AT ANCHORAGE

CECILIA WILLIAMS,

Plaintiff,

vs.

SAFEWAY, INC.,

Defendant.

Case No. 3AN-12-6474, Civil

**COMPLAINT**

COMES NOW the Plaintiff, by and through her counsel of record, Thomas E.

Williams, and for cause of action alleges and complains as follows:

1. Plaintiff is a resident of the Third Judicial District, State of Alaska, over the age of eighteen (18) years, and in all ways fully competent to bring and maintain this action.
2. At all times pertinent to this action, SAFEWAY, INC. was an Alaskan business, in good standing, operating within the Third Judicial District, Anchorage, State of Alaska.
3. On or about September 22, 2011, at approximately 9:21am, Plaintiff was grocery shopping at the SAFEWAY, INC. store located at 5600 Debarr Road in Anchorage, Alaska.
4. Plaintiff was walking to the dairy department, passing through the floral department, adjacent to the produce section, and was walking past a clothing rack. The clothing, hanging down from the rack, prevented her from seeing a

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grape lying on the floor. Plaintiff stepped on the grape and slipped, which caused her to fall and strike her left knee on the floor in a twisting motion.

5. Plaintiff was in excruciating pain in her calf, foot, and low back. She filled out an incident report right away, and then sought medical attention for her injuries that evening.
6. As a result of the above-described incident, Plaintiff has experienced, and in the future will continue to experience, pain and suffering, as well as medical expenses, in an amount not yet known to Plaintiff.
7. Plaintiff was exercising due care and caution, while slowly walking, and is free of any contributory negligence.
8. Defendant, SAFEWAY, INC. owes a duty of care, to the public, to maintain their property, including but not limited to, clean floors, free of any hazards, and has a duty to keep the store free of hazards which could endanger people using the public marketplace.
9. Said Defendant breached that duty by its failure to adequately maintain their property; specifically, unmaintained floors with slip and fall hazards, thus causing Plaintiff's fall and her injuries.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays for relief as follows:

1. For judgment in favor of Plaintiff and against Defendant as follows:
  - a) For special and compensatory damages in a sum in excess of ONE

HUNDRED THOUSAND and 00/100 DOLLARS (\$100,000.00); and

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- b) For reimbursement of Plaintiffs' costs and reasonable attorney's fees incurred in the prosecution of this action, and
2. For such other and further relief as the court deems just and equitable in the premises.

DATED this 6 day of April, 2012, at Eagle River, Alaska.

THOMAS E. WILLIAMS, Attorney  
Counsel for Plaintiff

By: Thomas E. Williams  
THOMAS E. WILLIAMS  
AK Bar #7410115

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